

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

JAMES P. KREINDLER, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Ashton* plaintiffs in the above-captioned litigation and I submit this declaration in support of the motion for final judgment on behalf of the individual plaintiff listed in the exhibit attached hereto as Exhibit A (the “*Ashton 23 Plaintiff*”) and for permission to allow any remaining *Ashton* plaintiffs to move for the same relief in separate stages.

2. The source of my information and the basis for my belief in my statements contained herein is my personal involvement in this matter for 18 years; my firm’s representation of the *Ashton 23 Plaintiff* in connection with the September 11<sup>th</sup> litigation; communications directly from family members of the individuals killed in the attacks on September 11<sup>th</sup> and the plaintiff listed in Exhibit A; and other court records relating to the multi-district litigation to which the *Ashton* plaintiffs are parties. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. The decedent listed in Exhibit A died in the September 11<sup>th</sup> terrorist attacks and is survived by, among others, the immediate family member listed in Exhibit A. The relationship set forth in Exhibit A has been personally verified by staff members in my office who have obtained written documentation, retrieved biographical paperwork (such as marriage certificates, birth certificates, baptismal certificates, obituary notices and wedding announcements) and / or

conducted interviews with the family member listed in Exhibit A (or with their other family members) confirming the relationship set forth there.

4. To minimize the chance of any human error, my firm has instituted a further level of quality control, during which each client's file is reviewed a second time and the relationship and other information contained in Exhibit A was corroborated, as is the fact that the claimant survived the death of her loved one on September 11, 2001.

5. We have been retained by the plaintiff listed in Exhibit A to pursue recovery for her solatium losses arising out of the death of her loved one on September 11, 2001. We have verified that she has not recovered for her solatium damages previously nor does she have any other pending motion before this Court for compensation against Iran arising out of the September 11<sup>th</sup> attacks by reviewing court dockets and cross-checking this individual with other attorneys representing the relatives of persons killed on September 11, 2001.

6. For the 9/11 Decedent listed in Exhibit A, my law firm has confirmed that either the decedent or the plaintiff was a United States national as of September 11, 2001, either based on documentary evidence (such as copies of birth certificates, passports and / or verified applications to the September 11, 2001 Victim Compensation Fund) or personal interviews and / or written communications with the representative of the Estate of that 9/11 Decedent or his family members.

7. For all of the reasons set forth in this declaration and the *Ashton 23 Wrongful Death Plaintiff's Motion for Final Judgments*, I respectfully request that this Court grant the proposed order filed herewith.

Dated: March 24, 2021  
New York, NY

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/s/ James P. Kreindler  
James P. Kreindler